Michael Ramsaroop 111-12 103rd Ave. South Richmond Hill, NY 11419 (718) 340-8401

October 12, 2020

Honorable Edgardo Ramos United States District Court Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Ramsaroop v. Department of Education of the City of New York, et al., Docket No: 20-CV-04947 (ER)¹

Dear Judge Ramos,

I am the plaintiff *pro se* and I write to respond to your order on Defendants' request for a pre-motion to dismiss conference (ECF # 25).

I request that this pre-motion conference be held on a date that occurs <u>after</u> the mediation (ECF #7). Pro bono counsel, Susanne Toes Keane, of NYLAG, has already filed her notice of limited appearance for mediation on my behalf (ECF # 22), and we are waiting for the Mediation Office to assign a mediator.

The pre- motion conference by Defendant UFT to discuss their motion to dismiss has been adjourned until after the mediation (ECF# 19), therefore it is timely to suggest that the DOE Defendants, whose pre-motion conference request was filed on October 9, 2020, also wait on my response until after the mediation.

In addition, I request that I be given a 30-day extension following the results of the mediation to file my written response to the Defendant DOE's letter (ECF #24).

Respectfully submitted,

/s/ Michael Ramsaroop

cc: Arianna A. Donnellan, Counsel UFT (via ECF)Chumi R. Diamond, Counsel UFT (via ECF)Morgan Webber-Ottey, Assistant Corporation Counsel (via ECF)

¹ This letter was prepared with the assistance of New York Legal Assistance Group, SDNY Clinic for Pro Se Litigants.